

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	]	
	]	No. 16-CR-10185-GAO
v.	]	
	]	
ALIN HAUCA	]	

**JOINT INTERIM STATUS REPORT**

Pursuant to Local Rule 116.5(b), the parties hereby submit the following joint interim status report. The parties respectfully request that the Court accept this report in lieu of the status conference currently scheduled for November 9, 2017, and schedule an interim status conference on a date at least 30 days thereafter.

**I. Status of Discovery and Timing of Additional Production**

Automatic discovery is technically complete but, to support substantive discussions about resolving the case, the government continues to produce discovery as it collects documents. As of this date, the government has made five rolling productions. The government continues to collect materials from other domestic and international locations (primarily DEA offices in Seattle, Washington; Salt Lake City, Utah; Vienna, Austria; Frankfurt, Germany; and Bucharest, Romania). The government has received, and has produced, document productions from the governments of Moldova and Romania.

**II. Timing of Additional Discovery Requests and Potential for Resolution**

The parties have arranged to meet on November 16, 2017, to discuss additional discovery and to explore whether the case can be resolved short of trial. The defendant will identify any gaps he perceives in discovery produced so far, so the government can make further disclosures or the parties can at least narrow any remaining disagreements. The parties will also discuss resolving the case; although it is too soon to tell whether pretrial resolution is realistic, both sides agree that

discussion would be constructive. Both sides agree that it would be more efficient to allow the parties to meet on the above issues before appearing for a status conference.

**III. Protective Orders**

At this point, the parties do not anticipate the need for protective orders covering the production of personal information.

**IV. Excludable Delay**

The government, with the assent of the defendant, moves for exclusion of the period from November 9, 2017, through the date of the next conference set by the Court.

**V. Future Conferences**

The parties suggest an interim status conference at least a month from the date of this report to allow for discussions regarding a pretrial disposition. The parties suggest that the status conference currently scheduled for November 9, 2017, be waived.

Respectfully submitted,

William D. Weinreb  
Acting United States Attorney

Alin Hauca  
Defendant

By: /s/ Andrew Lelling  
Andrew Lelling  
Assistant U.S. Attorney

/s/ Mauro Wolfe  
Mauro Wolfe, Esq.  
Counsel to Alin Hauca

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants, on November 7, 2017.

/s/ Andrew Lelling  
Andrew E. Lelling